

Exhibit B

Shirley Gibson

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MONTANA
3 BILLINGS DIVISION
4 TRACY CAEKAERT, and
5 CAMILLIA MAPLEY,
6 Plaintiffs, Case No. CV-20-52-BLG-SPW
7 vs.
8 WATCHTOWER BIBLE AND TRACT
9 SOCIETY OF NEW YORK, INC.,
10 WATCH TOWER BIBLE AND
11 TRACT SOCIETY OF
12 PENNSYLVANIA, and BRUCE
13 MAPLEY SR.,
14 Defendants.
15 WATCHTOWER BIBLE AND TRACT
16 SOCIETY OF NEW YORK, INC.,
17 Cross Claimant,
18 BRUCE MAPLEY, SR.,
19 Cross Defendant.
20 _____
21 ARIANE ROWLAND, and JAMIE
22 SCHULZE Cause No. CV 20-59-BLG-SPW
23 Plaintiff,
24 vs.
25 WATCHTOWER BIBLE AND TRACT

Shirley Gibson

1 SOCIETY OF NEW YORK, INC.
2 and WATCH TOWER BIBLE AND
3 TRACT SOCIETY OF
4 PENNSYLVANIA,
5 Defendants.

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7
8
9 VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
10 UPON ORAL EXAMINATION OF
11 SHIRLEY GIBSON
12

13 BE IT REMEMBERED, that the
14 videoconference/videotaped deposition upon oral
15 examination of Shirley Gibson, appearing at the
16 instance of the Plaintiffs, was taken at 800 North
17 Last Chance Gulch, Suite 101, Helena, Montana, on
18 Thursday, April 14, 2022, beginning at the hour of
19 9:07 a.m., pursuant to the Federal Rules of Civil
20 Procedure, before Mary R. Sullivan, Registered
21 Merit Reporter, Certified Realtime Reporter, and
22 Notary Public.
23
24
25

Shirley Gibson

1 A. (Nods head.)

2 Q. And then Helena.

3 A. Yes.

4 Q. Which -- Which Kingdom Hall is in Helena?

5 A. I'm in Canyon Ferry congregation.

6 Q. Okay. And have you been a member of
7 other congregations in Helena?

8 A. No.

9 Q. Just that one?

10 A. Just that one.

11 Q. Okay. And is that the full list of the
12 congregations where you've served as a member?

13 A. All the -- All those places that I've
14 been.

15 Q. Yeah.

16 A. In Helena, this is the only one, yeah.

17 Q. Okay. All right.

18 Let's talk about paragraph 3 of your
19 affidavit. The first sentence you state that
20 Bruce, Sr. was a pedophile who started molesting
21 Tracy when she was four. And then you say [As
22 Read]: "This came out in 1977 when we learned that
23 another Ministerial Servant in the Hardin
24 congregation, Gunner Hain, had sexually molested
25 Tracy at his home."

60

Shirley Gibson

1 A. Yes.

2 Q. Why do you say 1977? You fairly -- How
3 do you feel about that number, that year? Pretty
4 certain about that?

5 A. Yes.

6 Q. Tell me why.

7 A. Because it was brought to my attention
8 all this stuff had happened, and I --

9 Q. How -- How was it brought your attention?

10 A. Well, because of Gunner Hain, it came
11 out. He was reprovved, but they didn't do anything
12 to Bruce 'cause he -- Anyway. I was told what had
13 happened, and then Bruce admitted he had too,
14 so -- but they didn't do anything with Bruce but
15 they did something -- they -- Gunner Hain was
16 reprovved is all.

17 Q. Who told you that?

18 A. Harold Rimby.

19 Q. And so when you say this came out in
20 1977, that -- that -- Harold Rimby told you
21 personally --

22 A. Yes.

23 Q. -- about Gunner Hain.

24 A. And my ex-husband.

25 Q. And your ex-husband molesting Gunner's

Shirley Gibson

1 stepdaughter. Gunner had molested his
2 stepdaughter and Tracy.

3 A. (Nods head.)

4 Q. How did Mr. Rimby know that?

5 MR. SWEENEY: Objection. Speculation.

6 A. Do I still answer?

7 BY MR. SHAFFER:

8 Q. Yeah, go ahead. Yeah.

9 A. Well, because Gunner told Harold.

10 Q. And then Harold told you.

11 A. Yes.

12 Q. Okay. Sounds like Harold told you about
13 Gunner. Did -- In -- In the same conversation he
14 told you that Bruce had done the same thing?

15 A. Yes.

16 Q. And do you know how Harold knew
17 that -- that Bruce had molested Tracy?

18 MR. SWEENEY: Objection. Speculation.

19 BY MR. SHAFFER:

20 Q. Go ahead. It's okay.

21 A. Well, Bruce admitted to Harold that he
22 had.

23 Q. Okay. And then Harold told you.

24 A. Yes.

25 Q. Okay. In 1977 -- Why do you say 1977 as

Shirley Gibson

1 opposed to 1978?

2 A. Because it was the year after we were
3 baptized.

4 Q. Okay. So you feel -- you're certain
5 about that number, 1977.

6 A. (Nods head.)

7 Q. Yeah. Where were you when you had this
8 conversation with Mr. Rimby?

9 A. In our home at Fort Smith.

10 Q. Who else was there?

11 A. My ex-husband.

12 Q. So just the three of you?

13 A. Yeah. Well, my children were there, too.

14 Q. Okay. And had Mr. Rimby announced he was
15 going to come over to have this conversation with
16 you or did he just show up, or how'd that happen?

17 A. I guess just showed up. I don't
18 remember. We didn't make announcements; we just
19 came --

20 Q. Okay.

21 A. -- to each other's homes.

22 Q. I take it it was a surprise. It was
23 shocking.

24 A. Yes.

25 Q. Is that fair?

Shirley Gibson

1 A. And the first thing I said was "We need
2 to call the authorities."

3 And Harold said, "I'll take care of it."

4 Q. Okay.

5 A. So I assumed he would, but he didn't.

6 Q. Okay.

7 A. I mean, maybe he did. He didn't call the
8 authorities, though. And that was my mistake.

9 Q. Was Harold an elder at that point?

10 A. Yes.

11 Q. And you're new to the church at that
12 point in time.

13 A. Yes.

14 Q. You understood that if Harold -- Harold
15 was essentially directing how to take care of this
16 situation. Is that right?

17 A. Yes.

18 Q. And would there be a consequence to you
19 as a member if you did -- if you disobeyed
20 Mr. Rimby's command to not tell the authorities?

21 A. No, there wouldn't have been a problem.
22 I just assumed he was going to do it. He said he
23 was.

24 Q. He said he was going to tell the
25 authorities or he was going to handle it?

Shirley Gibson

1 Q. Okay. Who -- Can you identify other
2 people who knew about it by name?

3 A. Martin Svenson, James Rowland,
4 Joyce Hains, June Rimby. All deceased now.

5 Q. Mm-hmm. Anyone else that you know that
6 knew about it?

7 A. No.

8 Q. Were you permitted to tell people about
9 it?

10 A. I could have, but I didn't.

11 Q. Okay. So you understood that you could,
12 you could have gone to the authorities or you
13 could have told people about it, but you didn't.

14 A. Yes.

15 Q. You chose not to.

16 A. I chose not to.

17 Q. Okay.

18 A. It was a mistake.

19 Q. Sorry?

20 A. Was a mistake.

21 Q. Okay. And had you ever been taught as a
22 member of the church that the elders direct how to
23 handle situations like wrongdoing within the
24 congregation?

25 A. Yes.

Shirley Gibson

1 Q. Okay. Tell me about that. When were you
2 taught that?

3 A. I suppose during my studies. I
4 don't -- I don't remember where I learned it. I
5 mean, it's just something we do.

6 Q. How was it supposed to work, then? So
7 there's -- there's alleged wrongdoing in the
8 church. How is it supposed to work? What are --
9 What are you supposed to do with that information?

10 A. Okay. You go to the elders.

11 Q. Okay.

12 A. You have a sit-down with them, tell them
13 the situation, and they take care of it.

14 Q. And they're in charge of handling that,
15 right, at that point?

16 A. Yes.

17 Q. It's out of your hands.

18 A. Yes.

19 Q. Okay.

20 A. Well, I mean, unless they need more
21 information.

22 Q. Okay. And is there a process that the
23 elders are supposed to use to determine if
24 wrongdoing has occurred?

25 A. I don't know how they handle it. I know

Shirley Gibson

1 they discuss it, and I don't -- I don't know.

2 Q. Yeah. Right. Is it a process, though,
3 that as a member you've -- you come to trust this
4 process, you're taught this process if there's
5 wrongdoing, you take it to an elder and you trust
6 it's going to be handled. Right?

7 A. Yes.

8 Q. Okay. And that's what you're taught as a
9 member.

10 A. Yes.

11 Q. Okay. Did you know Mr. Hain?

12 A. Yes, I did.

13 Q. And did he voluntarily go to Mr. Rimby
14 and the elders to say, "Hey," --

15 A. I have no idea.

16 Q. -- "I molested" --

17 A. I never asked.

18 Q. So you don't know how that came about.

19 A. Hm-mmm.

20 Q. And do you know what brought about
21 Bruce's decision to tell Mr. Rimby that he had
22 been molesting Tracy?

23 A. I don't know what his reason was.
24 Probably because he'd molested other girls, too,
25 so -- I don't know that for sure, but...

Shirley Gibson

1 Q. Okay. And as I understand it, that
2 continued to happen after 1977, didn't it?

3 A. That's what Tracy told me, yes.

4 Q. How about Camie?

5 A. Camie never talked about it; not with me.

6 Q. Okay. What is your understanding,
7 though? Do you have an understanding that Bruce
8 also molested Camie?

9 A. I'm -- I -- Well, as messed up as she is,
10 yes, I believe he had.

11 Q. And that continued after 1977. You -- It
12 would be fair, wouldn't it?

13 A. Yes.

14 Q. Okay. Okay. Paragraph 5 of your
15 affidavit. "Shortly after this meeting." When
16 you say "this meeting," you're talking about the
17 meeting in your home where Bruce confessed to the
18 family. Right?

19 A. Yes.

20 Q. You say you spoke with Harold Rimby at
21 the Hardin congregation.

22 A. Yes.

23 Q. Does that mean you were at the
24 congregation when you -- when you spoke with them?

25 A. I think they -- we were at the Kingdom

Shirley Gibson

1 Hall, I believe.

2 Q. Okay. "Shortly after," what does that
3 mean to you? Is that days or weeks? What do you
4 think?

5 A. Shortly after.

6 Q. [As Read]: "Shortly after the meeting."

7 A. I'm not sure what I -- I mean, I don't
8 know the exact time. I just know it was --

9 Q. Yeah.

10 A. I don't know if it was days or weeks or
11 hours. It could have been after a congregation
12 meeting that I talked to him. I can't remember.

13 Q. Yeah. Was it -- I should have asked a
14 better question; that was kind of a dumb question.

15 Was it relatively close in time to when
16 Bruce confessed to the family?

17 A. Yes.

18 Q. It would have been foremost in your mind
19 at that point in time, I assume?

20 A. Yes.

21 Q. Yeah. And so soon after the -- Bruce's
22 confession to the family you have an opportunity
23 to speak with Mr. Rimby at the Kingdom Hall in
24 Hardin as I understand what you're saying here in
25 paragraph 5. Is that right so far?

Shirley Gibson

1 A. Yes.

2 Q. Okay. And you spoke with him about what
3 Bruce had been doing to Tracy.

4 A. Yes.

5 Q. What did you talk about? What did you
6 tell him?

7 A. I don't remember the exact words, but it
8 was due to the situation.

9 Q. Why did you choose to go to Mr. Rimby as
10 opposed to somebody else?

11 A. Because we only had two elders, and he
12 was there. He was the one there.

13 Q. And how did you know to talk to an elder
14 about it? Is that what you had been -- I think
15 we've talked about this earlier today, but that's
16 kind of what you were taught as a member, if
17 you've got an issue like this in your family, you
18 go to an elder. Right?

19 A. Yes.

20 Q. So you were kind of doing -- you were
21 taking it to the person who you believed you were
22 supposed to take it to, this issue.

23 A. Yeah.

24 Q. Did Mr. Rimby take any notes, do you
25 know?

Shirley Gibson

1 A. No.

2 Q. Okay. Was anyone else there?

3 A. No.

4 Q. You -- Do you remember -- Is it pretty
5 clear in your head? These are the kinds of things
6 that might still be very clear in your head.

7 A. Yes, he was -- him and I were alone.

8 Q. Okay.

9 A. In the library.

10 Q. In the library, okay. Sitting down?

11 A. Yes.

12 Q. And I assume you -- you sit down with him
13 one-on-one in the library 'cause you trust that
14 this is the best way to handle the situation.

15 A. Yes.

16 Q. The rest of this paragraph 5 you talk
17 about mentioning whether you should take this to
18 the authorities, you mention that to Mr. Rimby.
19 He says no, that the church will handle it
20 internally. Do you see that? Is that accurate?

21 A. Yes.

22 Q. Okay. At the time you trusted that,
23 correct, that the church would handle it?

24 A. Yes.

25 Q. In your view, did the church handle it?

Shirley Gibson

1 A. So how could we control --

2 Q. Sure.

3 A. -- what he did?

4 Q. Sure. Yeah.

5 A. I don't think the organization should be
6 responsible for somebody's conduct.

7 Q. I understand, yeah.

8 Do you know what Mr. Rimby did, if
9 anything?

10 A. No, I do not.

11 Q. So you don't know if he did anything with
12 the information you gave him.

13 A. No.

14 Q. But you did trust that was the proper way
15 to handle it. Correct?

16 A. Yes.

17 Q. Okay. Tell me about that. Why did you
18 trust that that was the proper way to handle it?

19 A. Well, because Jehovah has an
20 organization. He's appointed men to shepherd our
21 congregation, take care of us.

22 Q. Those men being the elders.

23 A. Yes.

24 Q. In your experience with the church, have
25 you -- have you been able to observe how members

Shirley Gibson

1 like Gunner had. Is that correct?

2 A. Correct.

3 Q. Okay. And do you know why that is?

4 A. No, I don't.

5 Q. Do you have any -- any sort of guesses?

6 Is that -- Does that seem strange to you --

7 MR. SWEENEY: I'll object --

8 BY MR. SHAFFER:

9 Q. -- after what you've told Mr. Rimby?

10 MR. SWEENEY: I'll object to the extent
11 it calls for speculation.

12 BY MR. SHAFFER:

13 Q. I'm curious if you have any thoughts
14 about that. Why -- You've told Mr. Rimby that two
15 people have molested Tracy, one of them was put on
16 reproof. Why not the other one?

17 A. I guess I believed it's 'cause we were
18 just so new in the truth. I don't know.

19 Q. Okay. And then you state "6 to 8 months
20 later Gunner Hain was reinstated with full
21 privileges."

22 Is that also announced to the
23 congregation?

24 A. Yes.

25 Q. Is anything else announced with that

Shirley Gibson

1 or --

2 A. No.

3 Q. Just a simple statement.

4 A. (Nods head.)

5 Q. He's back.

6 A. Yes.

7 Q. Okay. Traveling overseers, do you know
8 what I'm referring to when I -- with that term?

9 A. Yes.

10 Q. How would you describe a traveling
11 overseer?

12 A. They have a circuit that they -- they
13 visit once a week. We usually get visited by a
14 circuit overseer twice a year, and they review
15 everything that's going on in the congregation,
16 and see how things are going, and they're there to
17 encourage us.

18 Q. And is the circuit overseer interacting
19 with all of the members?

20 A. Yes.

21 Q. And is there just -- you don't have
22 to -- there's, not, like, formal meetings set up,
23 they're just attending. How's it work?

24 A. Well, they meet every day during the
25 morning, we meet for field service, and we all go

Shirley Gibson

1 Q. Or you would have done something about it
2 if you'd known.

3 A. I would have, yes.

4 Q. Yeah. And it's fair to say you didn't
5 know Gunner had abused -- molested Tracy until
6 he -- until he confessed, right?

7 A. Yes.

8 Q. And so, then, it's also fair to say that
9 there was sexual abuse happening in Hardin that
10 you weren't aware of until it had been confessed
11 to. Is that fair?

12 A. That's fair.

13 Q. Okay.

14 MR. TAYLOR: Objection to the form.

15 BY MR. SHAFFER:

16 Q. And as I understand it, as soon as you
17 found out about the sex abuse happening in Hardin
18 specifically, Tracy, and to Ronda, your first
19 thought was to notify the elder of the church. Is
20 that fair?

21 A. Yes.

22 Q. Your second thought was to ask that elder
23 about whether to report it to the authorities. Is
24 that also fair?

25 A. That's fair.

Shirley Gibson

1 Q. Okay. And that elder said he'll handle
2 it.

3 A. That's what he said.

4 Q. Okay. The affidavit. I -- I assume
5 you've never drafted an affidavit before?

6 A. (Shakes head.)

7 Q. And --

8 A. No.

9 Q. And you haven't been trained in how to do
10 so.

11 A. No. I've never even been in a courtroom,
12 so --

13 Q. Right. And you would rely on other
14 people to draft a legal document like this since
15 you have not been trained in it and don't know how
16 to do it, right?

17 A. Correct.

18 Q. But you checked it for accuracy before
19 you signed it.

20 A. Well, I thought I had, but...

21 Q. Well, let's talk about it. I want to
22 make sure -- I want to know what's -- we've talked
23 a lot about your affidavit today. In fact, we
24 went through it paragraph by paragraph, and I
25 don't remember you saying to me, anyway, that any

Shirley Gibson

1 accurate.

2 Q. Okay. 'Cause this is the opportunity
3 to -- to sort through that, and I don't want to
4 keep proceeding in this case if it's -- if there's
5 anything in here that's not accurate, and I don't
6 think anybody else does.

7 MR. SHAFFER: I don't have any other
8 questions.

9 EXAMINATION

10 BY MR. TAYLOR:

11 Q. Ms. Gibson, this is Joel Taylor.
12 Paragraph 5 of your affidavit, it says that -- if
13 you look at the second sentence it says "During
14 that conversation I asked elder Howard Rimby if we
15 should report the matter to the authorities and he
16 said no."

17 Did Mr. Rimby ever tell you no, you
18 cannot report the abuse to the authorities?

19 A. He did not say it that way, no. He said
20 he would handle it.

21 Q. He said he would handle it. But the
22 affidavit says that he said no. That's what the
23 affidavit says. "If we should report the matter
24 to the authorities and he said, no."

25 That's not correct, is it?

177

Shirley Gibson

1 MR. SHAFFER: Object to form. Vague;
2 ambiguous; compound.

3 A. He said, "No, I will handle it."

4 BY MR. TAYLOR:

5 Q. So did anybody tell you no, you can't
6 report to the authorities?

7 A. No, nobody told me. It was my mistake
8 not to have.

9 Q. Okay. And do you know if Mr. Rimby
10 reported it to the authorities?

11 A. Not to my knowledge. If they did, both
12 guys would have been in prison.

13 Q. Okay. So I just want to be clear. You
14 don't know if Mr. Rimby reported it or not; is
15 that correct?

16 A. Correct.

17 Q. Okay.

18 MR. TAYLOR: I have no further questions.

19 MR. SWEENEY: I don't have any either.

20 THE VIDEOGRAPHER: Okay. That will
21 conclude today's deposition. The time is 2:20.

22 (Deposition concluded at 2:20 p.m.

23 Deponent excused; signature reserved.)
24
25